## **Morgan Lewis**

## Memo Endorsed

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March 16, 2020

## **Via ECF**

The Honorable Ona T. Wang United States District Court For the Southern District of New York 500 Pearl Street New York, NY 10007



Re: Morgan v. eReplacementparts.com, LLC, No. 1:19-cv-11501-PGG-OTW
Request to Extend Defendant's Time to Respond to Complaint

Dear Judge Wang:

We represent defendant eReplacementparts.com, LLC ("Defendant") in the above-referenced action. Pursuant to Rules I(b) and I(e) of Your Honor's Individual Practices, we write with the consent of counsel for plaintiff Jon R. Morgan ("Plaintiff"), respectfully to request that the Court extend Defendant's time to respond to the Complaint to from March 16, 2020 to March 23, 2020. This is Defendant's third request for an extension of time to file a response to the Complaint. The Court granted Defendant's prior requests.

In support of this request, counsel for Defendant states that the parties are continuing to engage in discussions about an early resolution of this action. If granted, this extension will permit the parties to focus on those efforts, rather than on pleadings and litigation. As noted above, Plaintiff's counsel consents to this request. If granted, this extension will not affect any other date scheduled in this action.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

/s/ Michael F. Fleming

Michael F. Fleming

Attorney for Defendant

cc: All Counsel of Record (via ECF)